

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Upon entry of this amendment, claims 7-30 and 37-60 will remain in the application.

Claims 25-30, 43, and 44 have been allowed.

Section 103 rejections

Claims 7-24, 37-43, and 45-60 were rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Imahashi et al. (US 5,413,958) in view of Celler et al. (US 4,406,709).

Applicants respectfully traverse the rejection.

Applicants have discovered that, in general, if the roughness and waviness of the surface of the substrate constituting the liquid crystal display is more than 5 μm , something interferes with the cell pair (page 8, lines 8-14). Accordingly, Applicants teach using a wafer chuck with a surface roughness of 5 μm or less to cause the surface of the wafer to have a flatness of 5 μm or less. Applicants submit that currently available wafer chucks do not meet this degree of tolerance.

Neither Imahashi nor Celler teaches or suggests, either alone or in combination, using a wafer chuck with a surface roughness of 5 μm or less while irradiating the wafer surface with a linear laser. Furthermore, neither Imahashi nor Celler recognize or provide any teaching regarding the relationship between such a high degree of surface flatness and the performance of cell pairs in a liquid crystal display formed using the surface of the substrate. Accordingly, Applicants submit that one skilled in the art would not find it obvious to

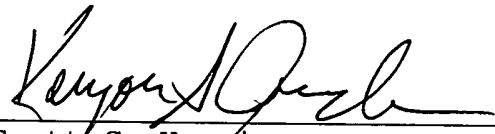
use a wafer chuck with a surface roughness of 5 μ m or less, and that the Action has failed to make a prima facie showing of obviousness.

Applicant asks that all claims be allowed.

Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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